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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

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11 AYNUR KABOTA, an individual,

CASE NO. 2:19-cv-01497-JAD-VCF

12 Plaintiff,

13 vs.

14 EDUVISION, INC., dba ARIZONA
COLLEGE, a foreign corporation domiciled in
15 Missouri; SENTINEL PEAK CAPITAL, LLC,
dba ARIZONA COLLEGE, a Delaware
16 Limited Liability Company; DIANE
THOMASON, an individual; DANIEL J.
17 NAVARRO, an individual; PATRICIA T.
18 ALPERT, an individual; MARIE
HALLINAN, an individual,

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANTS EDUVISION, INC.,
MARIE HALLINAN AND PATRICIA T.
ALPERT TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

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Defendants.

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IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff AYNUR KABOTA ("Plaintiff") and Defendants EDUVISION, INC., d/b/a ARIZONA COLLEGE, MARIE HALLINAN and PATRICIA T. ALPERT ("Defendants"), by and through their respective counsel of record Raelene K. Palmer of THE PALMER LAW FIRM, P.C., and Bruce C. Young, Esq. of the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP, as follows:

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1 Counsel for Defendants has only recently been retained to represent Defendants in this
2 matter. In light of the numerous allegations and causes of action set forth in the Complaint against
3 several named defendants (including the currently represented Defendants), as well as the need for
4 counsel for Defendants to ethically determine if joint representation of all of the named defendants
5 is appropriate, an extension of time for Defendants to answer or otherwise respond to the
6 Complaint is necessary.

7 Based on the dates of service, Defendants Eduvision, Inc. and Alpert's responses to
8 Plaintiff's Complaint are due on November 19, 2019 and Defendant Hallinan's response is due on
9 November 26, 2019. In order to allow counsel for Defendants sufficient time to investigate the
10 facts and prepare an appropriate response to the Complaint, the Parties have agreed to stipulate to
11 extend the time for Defendants to respond to Plaintiff's Complaint until December 20, 2019.

12 This extension is not sought for any improper reason or for the purpose of delay.

13 DATED this 19th day of November, 2019. DATED this 19th day of November, 2019.

14 LEWIS BRISBOIS BISGAARD & SMITH LLP THE PALMER LAW FIRM, P.C.

15 By /s/ Bruce C. Young, Esq.

Bruce C. Young, Esq.
Paige S. Shreve, Esq.
6385 S. Rainbow Boulevard, Suite 600
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Attorneys for Defendants
Eduvision, Inc., Marie Hallinan and
Patricia T. Alpert

By /s/ Raelene K. Palmer

Raelene K. Palmer, Esq.
5550 Painted Mirage Road, Suite 320
Las Vegas, Nevada 89149
Attorneys for Plaintiff Aynur Kabota

21 [PROPOSED] ORDER

22 Pursuant to the Stipulation of the Parties, and good cause appearing therefore:

23 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendants' responses to
24 Plaintiff's Complaint shall be filed on or before December 20, 2019.

25 DATED this 20th day of November, 2019.



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28 UNITED STATES MAGISTRATE JUDGE